

AFFIDAVIT OF REGINA DJORDJEVIC

I, Regina Djordjevic, make this affidavit based on my personal knowledge and experiences. If called, my testimony would be consistent with the statements in this affidavit.

1. I am a Caucasian woman.
2. While contracted by The Detroit Club, my legal name was Regina Peter.
3. I have a tenured background in the hospitality industry and a reputable work history in the Metro-Detroit area.
4. In September 2017, The Detroit Club contracted me as a 1099 associate as the Marketing & Event Coordinator under the guise and terms of the 'offer letter' my employment would be transition to or incorporated into a payroll position.
5. My primary job expectations were to: create and manage branding, social media messaging, event and client procurement, and operational objectives related to sales, marketing, and event production.
6. During my time with The Detroit Club, I worked directly for its owners, Lynn and Emre Uralli.
7. Although never 'employed' by The Detroit Club, due to 'preferable' taxable liabilities to the Urallis, my job description and expectations were amended as the cardinal employee of the property to include: job analysis, creating job descriptions, designing hiring plans and departmental staffing needs to meet operational performance and forecasting, performing interviews, operational forecasting and P&L projections, and drafting and implementing new hire documents to include the Employee Handbook, employment application, offer letters, and hiring practice checklists.
8. While working as an independent contractor, the Urallis paid me bi-weekly, with an additional monthly stipend for health insurance and added my personal cellular phone to the company sponsored plan.
9. At the point of tendered resignation, the Urallis do not owe me any back wages.
10. At the point of tendered resignation and employment dissolution, the Urallis refused to release my personal cellular number back to me. After which, I had to obtain a new device and number which severely impacted my professional abilities to contact clients and posed financial disparities to me and my family. Additionally, it should be noted representatives of The Detroit Club continued to utilize my cellular number to contact and correspond with clients after my departure while acting in the likeness of my person.
11. During my tenure with The Detroit Club, Lynn Uralli was present daily and actively participated in the day-to-day affairs of The Detroit Club.
12. During my time with The Detroit Club, Lynn Uralli questioned or outright rejected my recommendations of quality candidates based on their race, and other Title VII protected classes.
13. Example I, Lynn Uralli stated to me, after an extensive interview process, a qualified African American spa manager applicant was "too black." It should be noted this applicant was well-respected and knowledgeable; who worked with and for several high-profile Detroit professionals and news agents.
14. Example II, I recommended an experienced Latina woman for a hostess position at The Detroit Club's *Grill Room*. The individual had comparable experience at the Foundation Hotel (situated less than a mile from The Detroit Club). Lynn Uralli responded, "she is cute, but is a little too Mexican trashy."

15. Example III, during conversations with Lynn Uralli she frequently referred to The Detroit Club's minority kitchen staff as "gangbangers," and in at least one instance, stated to me she was going to withhold their pay because "they were going to steal stuff on their way out anyways."
16. Example IV, during a conversation with Lynn Uralli she stated to me that two African American hostesses working at The Detroit Club's *Grill Room* look like "ni**r pigs" and they "smell like garbage" because of the lotion they were using. Lynn Uralli stated these two African American employees needed to be addressed for their "image" and "smell" and The Detroit Club's employee dress code needed to be refined.
17. Example V, Lynn Uralli directed me to host a conversation with the, then, Front Desk Supervisor, also a Caucasian woman, however within Title VII age discrimination parameters, and reduce her working wages after this employee had been employed with The Detroit Club for a number of weeks.
18. Example VI, after interrupting a scheduled site visit between myself and an African American, male, client, Lynn Uralli stated that she was "uncomfortable" with him "lingering in the club" and said we need to "advertise to a higher-profile clientele." It should be noted this client was/is a respected radio personality who had successfully produced and executed events with me in previous professional roles.
19. Example VII, a well-respected, African American, male, entrepreneur client of mine recorded a club tour video that included a personal interview with me. This client later posted the tour and interview video to his professional Facebook page with permission and acknowledgement of me, as an individual, and The Detroit Club, as a marketing representative. Lynn Uralli demanded the video to be removed, "deleted," from Facebook as she "didn't want to promote to that group of people" or have "that crowd think they could come into the club." It should be noted this specific client has gone on to build several successful personal and outside professional brands, marketing company, and was a TedX Detroit speaker in 2021.
20. It should be noted that I admonished Lynn for making such judgements and comments at each occurrence. I professed professional challenges to Lynn Uralli such as: "can't say things like that," "these are my clients who are professionals and they ought to be respected," "we live in a diverse city we need be diverse," and "we cannot close off the club based on personal perspectives." Ultimately, the individual(s) mentioned were hired and employed but faced constant disparate criticism from Lynn and Emre Uralli.
21. I often notified Lynn Uralli that her comments were inappropriate but, by all impressions, she did not care or change her ways.
22. I resigned from my position on April 18, 2018.
23. After my resignation, I was exposed to a series of personal and professional threats from both Lynn and Emre Uralli.
24. Upon resignation, I fulfilled my contractual obligations to The Detroit Club and professionally turned over all credentials, schedules, and content (both written and creative) to The Detroit Club management in person. It should be noted this exchange was to take place for the reciprocal proprietary passion of my cellular phone number which was not fulfilled by Lynn or Emre Uralli.
25. After my resignation, Lynn and/or Emre Uralli slandered my professionalism to a key headhunter/placement agency which led to a series of unfulfilled meetings and employment opportunities.

26. It should be noted that, after my experience working with Lynn and Emre Uralli (The Detroit Club) I have since left the hospitality industry, too marred by their behavior, and continued my graduate studies at Villanova University in Human Resource Development with a concentration and certificate in Diversity, Equity and Inclusion.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE ABOVE AND FOREGOING ANSWERS ARE TRUE, COMPLETE AND CORRECT TO THE BEST OF MY INFORMATION, KNOWLEDGE, AND BELIEF. FURTHER AFFIANT SAYETH NOT.

7/26/22

Date


Regina Djordjevic